

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Competitive Product Prices  
Priority Mail Express, Priority Mail &  
First-Class Package Service  
Priority Mail Express, Priority Mail &  
First-Class Package Service Contract 30

Docket No. MC2018-40

Competitive Product Prices  
Priority Mail Express, Priority Mail &  
First-Class Package Service Contract 30  
(MC2018-40)  
Negotiated Service Agreement

Docket No. CP2018-70

PUBLIC REPRESENTATIVE COMMENTS ON  
POSTAL SERVICE REQUEST TO ADD PRIORITY MAIL EXPRESS, PRIORITY MAIL  
& FIRST-CLASS PACKAGE SERVICE CONTRACT 30  
TO COMPETITIVE PRODUCT LIST

(December 7, 2017)

The Public Representative hereby provides comments pursuant to the Commission Notice Initiating Dockets.<sup>1</sup> In that Notice, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Request to add Priority Mail Express, Priority Mail & First-Class Package Service Contract 30 to the competitive product list.<sup>2</sup>

The effective date of the instant contract is two business days following the day on which the Commission issues all necessary regulatory approval. Request, Attachment B, at 10. The contract is scheduled to expire 3 years from the effective date, subject to early termination provisions and other terms and conditions. *Id.*

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<sup>1</sup> Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, December 4, 2017 (Notice).

<sup>2</sup> Request of the United States Postal Service to Add Priority Mail Express, Priority Mail & First-Class Package Service Contract 30 to Competitive Product List and Notice of Filing (Under Seal) of Unredacted Governors' Decision, Contract, and Supporting Data, December 1, 2017 (Request).

The Public Representative has reviewed the Postal Service's Request, including the Statement of Supporting Justification, the contract and financial model filed under seal with the Request. Based upon that review, the Public Representative concludes that Priority Mail Express, Priority Mail & First-Class Package Service Contract 30 should be categorized as a competitive product and added to the competitive product list. In addition, it appears that the instant contract should generate sufficient revenues to cover costs in its first year, and thereby satisfy 39 U.S.C. § 3633(a) during the first year. The Commission will have an opportunity to review the revenue, cost and volume data for Priority Mail Express, Priority Mail & First-Class Package Service Contract 30 in the future Annual Compliance Determination (ACD) reports for compliance with 39 U.S.C. § 3633(a).

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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